

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:	§	
	§	Chapter 11
MCDERMOTT INTERNATIONAL, INC.,	§	
<i>et al.</i> , ¹	§	Case No. 20-30336 (MI)
	§	
Reorganized Debtors.	§	(Jointly Administered)
	§	

**UNOPPOSED EMERGENCY MOTION TO CONVERT APRIL 11, 2024 HEARINGS ON
THE U.S. TRUSTEE'S MOTION TO REOPEN CASE
TO STATUS CONFERENCE
[Relates to Dkt. No. 1138]**

Emergency relief has been requested. Relief is requested not later than 5:00 p.m. on April 1, 2024.

If you object to the relief requested or you believe that emergency consideration is not warranted, you must appear at the hearing if one is set, or file a written response prior to the date that relief is requested in the preceding paragraph. Otherwise, the Court may treat the pleading as unopposed and grant the relief requested.

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

Jackson Walker LLP (“JW”) files this *Unopposed Emergency Motion to Convert April 11, 2024 Hearings on the U.S. Trustee’s Motion to Reopen Case to Status Conference* (the “Motion”),² and in support thereof, states as follows:

¹ A complete list of each of the Debtors in these chapter 11 cases (the “Chapter 11 Cases”) may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.primeclerk.com/McDermott>. The location of Debtor McDermott International, Inc.’s principal place of business and the Debtors’ service address in these Chapter 11 Cases is 757 North Eldridge Parkway, Houston, Texas 77079.

² Similar relief will be requested for the hearings currently set on the U.S. Trustee’s motions to reopen the cases pending before the Honorable Christopher Lopez.

RELIEF REQUESTED AND BASIS FOR EMERGENCY CONSIDERATION

1. On January 31, 2024, Kevin M. Epstein, U.S. Trustee for Region 7 (the “U.S. Trustee”), filed his *Motion of the United States Trustee to Reopen Case* [Dkt. No. 1138] (the “Motion to Reopen”). JW filed a response in opposition to the Motion to Reopen on March 6, 2024. *See* Dkt. No. 1142. Similar pleadings were filed by both the U.S. Trustee and JW in other closed cases also pending before this Court.

2. A hearing is currently set on the Motion to Reopen and JW’s opposition in this case and in other cases before this Court for April 11, 2024 at 10:30 a.m.

3. The U.S. Trustee and JW have been in discussions and are currently working on a proposed form of agreed order that would obviate the need for a substantive hearing on April 11, 2024.

4. Given those ongoing discussions, JW requests that the Court convert the hearings currently set for April 11, 2024 in this case and in other closed cases involving similar relief pending before this Court to a status conference to allow the parties time to document their proposed agreement, which the parties anticipate presenting to this Court on April 11, 2024. The U.S. Trustee does not oppose JW’s request.

5. In the absence of emergency consideration, the U.S. Trustee and JW will each have to expend significant time and resources preparing for a contested matter in five (5) cases pending before this Court³ (and four (4) cases pending before Judge Lopez)⁴ that would otherwise be

³ *See In re Sheridan Production Partners I-A, L.P.*, Case No. 20-31884 (MI) [Dkt No. 10]; *In re Volusion LLC*, Case No. 20-50082 (MI) [Dkt. No. 334]; *In re Seadrill Member LLC*, Case No. 22-90001 (MI) [Dkt. No. 8]; *In re TMW Merchants, LLC*, Case No. 20-33916 [Dkt. No. 253].

⁴ *In re Denbury Holdings Inc.*, Case No. 20-33812 (CML) [Dkt. No. 11]; *In re iQor Holdings*, Case No. 20-34500 (CML) [Dkt. No. 323]; *In re Jones Energy, Inc.*, Case No. 19-32112 (CML) [Dkt. No.]; *In re Energy Services Puerto Rico, LLC*, Case No. 20-32679 (CML) [Dkt. No. 8].

avoidable. JW submits that allowing the parties time to finalize their agreement as opposed to hearing preparation is a more efficient use of this Court's time and resources.

[Remainder of Page Intentionally Left Blank]

Dated: April 1, 2024

Respectfully submitted,

NORTON ROSE FULBRIGHT US LLP

/s/ Jason L. Boland

Jason L. Boland (SBT 24040542)
William R. Greendyke (SBT 08390450)
Maria Mokrzycka (SBT 24119994)
1301 McKinney Street, Suite 5100
Houston, Texas 77010
Telephone: (713) 651-5151
jason.boland@nortonrosefulbright.com
william.greendyke@nortonrosefulbright.com
maria.mokrzycka@nortonrosefulbright.com

Jason I. Blanchard (SBT 24130197)
2200 Ross Ave., Suite 3600
Dallas, Texas 75201
Telephone: (214) 855-8274
jason.blanchard@nortonrosefulbright.com

James A. Copeland (*pro hac vice* to be filed)
1301 Avenue of the Americas
New York, New York 10019
Telephone: (212) 408-5471
james.copeland@nortonrosefulbright.com

Counsel for Jackson Walker LLP

CERTIFICATE OF SERVICE

I hereby certify that on April 1, 2024, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Jason L. Boland

Jason L. Boland

CERTIFICATE OF CONFERENCE

I hereby certify that I conferred with Vianey Garza, trial attorney with the U.S. Trustee, prior to filing this Motion, and Ms. Garza stated that the U.S. Trustee does not oppose the request requested.

/s/ Jason L. Boland

Jason L. Boland

CERTIFICATE OF ACCURACY

I hereby certify that the information contained in the foregoing Motion is true and correct to the best of my knowledge.

/s/ Jason L. Boland
Jason L. Boland